

TCEQ DOCKET NO. 2025-0117-MWD

APPLICATION BY	§	BEFORE THE
SERENITY RV RESORT LP	§	
FOR TPDES PERMIT NO.	§	TEXAS COMMISSION ON
WQ0015946001	§	ENVIRONMENTAL QUALITY

**EXECUTIVE DIRECTOR'S RESPONSE TO HEARING REQUESTS AND
REQUESTS FOR RECONSIDERATION**

I. INTRODUCTION

The Executive Director (ED) of the Texas Commission on Environmental Quality (Commission or TCEQ) files this Response to Hearing Requests and Requests for Reconsideration on an application by Serenity RV Resort LP (Applicant) for a new TPDES Permit No. WQ0015946001. The Office of the Chief Clerk received contested case hearing requests from the following individuals: Henry Green, Kathy Green, Billy Forrester, Annetta Stewart, Patrick Parker, a Concerned Citizen, Michelle Lee Pina, Gary L. Smith, Catherine Buchanan Lehmann, Jennifer Clare, Wade Clare, Laurel Palmer, Shirley Koop Bononi, Mark Bononi, William Palmer, Doyle Alan Koop, Kenton Adams Moyer, Wiede Koop Cutshall, Shirley Koop Bononi, Linda Stowe Koop, Melanie Nunley, Lesley A. Koop, Shannon Lewis, Philip R. Manning, Mark Hunter Echols, and Martin Brown.

The ED also received Requests for Reconsideration from Heather Broxton and David S. Hall.

The ED recommends that the Commission grant the hearing requests of Henry Green and Kathy Green. The ED recommends that the Commission deny the remaining hearing requests and requests for reconsideration.

Attached for Commission consideration is a satellite map of the area showing the locations of the facility, discharge route, and requestors.

II. FACILITY DESCRIPTION

The applicant has applied for a new TPDES permit to authorize the discharge of treated domestic wastewater at a daily average flow not to exceed 0.02 million gallons per day (MGD). The proposed wastewater treatment facility will serve the Serenity Bay Resort.

The Serenity Bay RV Resort Wastewater Treatment Facility is an activated sludge process package plant operated in the conventional mode with nitrification. Treatment units include a bar screen, an aeration basin, a final clarifier, a sludge digester, and a chlorine contact chamber. The facility has not been constructed. Sludge generated from the treatment facility is hauled by a registered transporter to Mount Houston Road MUD Wastewater Treatment Facility, Permit No. WQ0011154001, to be digested, dewatered, and then disposed of with the bulk of the sludge from the plant accepting the sludge. The draft permit also authorizes the disposal of sludge at a TCEQ-

authorized land application site, co-disposal landfill, wastewater treatment facility, or facility that further processes sludge. The plant site will be located at 1344 County Road 302, in the City of Port Lavaca, in Jackson County, Texas 77979.

The treated effluent will be discharged to a man-made ditch, thence to Carancahua Bay in Segment No. 2456 of the Bays and Estuaries. The unclassified receiving water use is minimal aquatic life use for the man-made ditch. The designated uses for Segment No. 2456 are primary contact recreation exceptional aquatic life use, and oyster waters. The effluent limitations in the draft permit will maintain and protect the existing instream uses. In accordance with 30 Texas Administrative Code §307.5 and the TCEQ implementation procedures (June 2010) for the Texas Surface Water Quality Standards, an antidegradation review of the receiving waters was performed. A Tier 1 antidegradation review has preliminarily determined that existing water quality uses will not be impaired by this permit action. Numerical and narrative criteria to protect existing uses will be maintained. A Tier 2 review has preliminarily determined that no significant degradation of water quality is expected in Carancahua Bay, which has been identified as having exceptional aquatic life use. Existing uses will be maintained and protected. The preliminary determination can be reexamined and may be modified if new information is received.

Effluent limitations for the conventional effluent parameters (i.e., five-day Biochemical Oxygen Demand or five-day Carbonaceous Biochemical Oxygen Demand [CBOD5], Ammonia Nitrogen [NH3], etc.) are based on stream standards and waste load allocations for water-quality limited streams as established in the Texas Surface Water Quality Standards (TSWQS) and the State of Texas Water Quality Management Plan (WQMP).

Segment 2456 is currently listed on the State's inventory of impaired or threatened waters (the 2020 Clean Water Act Section 303(d) list). The listing is for bacteria in water in the upper half of bay (Assessment Unit [AU] 2456_02) and bacteria in oyster waters in the upper portion of bay and shoreline area (AU 2456OW_02).

This facility is designed to provide adequate disinfection and, when operated properly, should not add to the bacterial impairment of the segment. TMDL Project No. 108D: One Total Maximum Daily Load for Indicator Bacteria in Carancahua Bay has been approved for this segment.

On August 26, 2020, the TCEQ adopted One Total Maximum Daily Load (TMDL) for Indicator Bacteria in Carancahua Bay. The EPA approved the TMDL on October 9, 2020. The TMDL addresses elevated levels of bacteria in one assessment unit of one classified segment (Carancahua Bay - 2456_02). The TMDL does not include assessment unit 2456_01. This project takes a watershed approach, so one upstream unclassified water body is also subject to this TMDL (West Carancahua Creek Tidal - 2456A_01).

The waste load allocation (WLA) for wastewater treatment facilities (WWTFs) was established as the final permitted flow for each facility multiplied by the geometric mean criterion for bacteria multiplied by a conversion factor (to get to units per day). The allocated loads were calculated for *Escherichia coli* (*E. coli*) and *Enterococcus*. The two indicators allow flexibility in establishing permit limits so the WWTFs are subject to the limits for the chosen indicator bacteria in their permits. Future growth from existing or new permitted sources is not limited by these TMDLs as long as the sources do not exceed the limits provided.

To ensure that effluent limitations for this discharge are consistent with the WLAs provided in the TMDL, a concentration-based effluent limitation of 35 most probable number (MPN) per 100 mL for *Enterococcus* has been included in the draft permit.

III. PROCEDURAL BACKGROUND

The permit application was received on November 2, 2020, and declared administratively complete on January 19, 2021. The Notice of Receipt and Intent to Obtain a Water Quality Permit (NORI) was published in the *Jackson County Herald Tribune* on February 10, 2021. The ED completed the technical review of the application on June 30, 2021. A Notice of Application and Preliminary Decision (NAPD) was published in the *Jackson County Herald Tribune* on November 24, 2021. The Public Meeting Notice was published in the *Jackson County Herald Tribune* on July 13, 2022. The public meeting was held on August 15, 2022.

The public comment period ended on August 15, 2022, at the close of the public meeting. The hearing request period ended January 9th, 2025. This application was filed after September 1, 2015; therefore, this application is subject to the procedural requirements adopted pursuant to House Bill (HB) 801, 76th Legislature (1999), and Senate Bill (SB) 709, 84th Legislature (2015), both implemented by the Commission in its rules in 30 TAC Chapter 39, 50, and 55.

IV. THE EVALUATION PROCESS FOR HEARING REQUESTS

HB 801 established statutory procedures for public participation in certain environmental permitting proceedings, specifically regarding public notice and public comment and the Commission's consideration of hearing requests. SB 709 revised the requirements for submitting public comment and the Commission's consideration of hearing requests. The evaluation process for hearing requests is as follows:

A. Response to Requests

The ED, the Public Interest Counsel, and the Applicant may each submit written responses to a hearing request.¹

Responses to hearing requests must specifically address:

- (1) whether the requestor is an affected person;
- (2) which issues raised in the hearing request are disputed;
- (3) whether the dispute involves questions of fact or of law;
- (4) whether the issues were raised during the public comment period;
- (5) whether the hearing request is based on issues raised solely in a public comment withdrawn by the commenter in writing by filing a withdrawal letter with the chief clerk prior to the filing of the ED's Response to Comment;
- (6) whether the issues are relevant and material to the decision on the application; and
- (7) a maximum expected duration for the contested case hearing.²

¹ 30 Texas Administrative Code (TAC) Section (§) 55.209(d).

² 30 TAC § 55.209(e).

B. Hearing Request Requirements

For the Commission to consider a hearing request, the Commission must first determine whether the request meets certain requirements:

Affected persons may request a contested case hearing. The request must be made in writing and timely filed with the chief clerk. The request must be based only on the requestor's timely comments and may not be based on an issue that was raised solely in a public comment that was withdrawn by the requestor prior to the filing of the ED's Response to Comment.³

A hearing request must substantially comply with the following:

- (1) give the time, address, daytime telephone number, and where possible, fax number of the person who files the request. If the request is made by a group or association, the request must identify one person by name, address, daytime telephone number, and where possible, fax number, who shall be responsible for receiving all official communications and documents for the group;
- (2) identify the person's personal justiciable interest affected by the application, including a brief, but specific, written statement explaining in plain language the requestor's location and distance relative to the proposed facility or activity that is the subject of the application and how and why the requestor believes he or she will be adversely affected by the proposed facility or activity in a manner not common to members of the general public;
- (3) request a contested case hearing;
- (4) list all relevant and material disputed issues of fact that were raised during the public comment period and that are the basis of the hearing request. To facilitate the commission's determination of the number and scope of issues to be referred to hearing, the requestor should, to the extent possible, specify any of the ED's responses to comments that the requestor disputes and the factual basis of the dispute and list any disputed issues of law; and
- (5) provide any other information specified in the public notice of application.⁴

C. Requirement that Requestor be an Affected Person/"Affected Person" Status

To grant a contested case hearing, the Commission must determine that a requestor is an "affected" person by conducting the following analysis:

- (a) For any application, an affected person is one who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application. An interest common to members of the general public does not qualify as a personal justiciable interest.
- (b) Except as provided by § 55.103 of this title (relating to Definitions), governmental entities, including local governments and public agencies,

³ 30 TAC § 55.201(c).

⁴ 30 TAC § 55.201(d).

with authority under state law over issues raised by the application may be considered affected persons.

- (c) In determining whether a person is an affected person, all factors shall be considered, including, but not limited to, the following:
 - (1) whether the interest claimed is one protected by the law under which the application will be considered;
 - (2) distance restrictions or other limitations imposed by law on the affected interest;
 - (3) whether a reasonable relationship exists between the interest claimed and the activity regulated;
 - (4) likely impact of the regulated activity on the health and safety of the person, and on the use of property of the person;
 - (5) likely impact of the regulated activity on use of the impacted natural resource by the person;
 - (6) for a hearing request on an application filed on or after September 1, 2015, whether the requestor timely submitted comments on the application that were not withdrawn; and
 - (7) for governmental entities, their statutory authority over or interest in the issues relevant to the application.
- (d) In determining whether a person is an affected person for the purpose of granting a hearing request for an application filed on or after September 1, 2015, the commission may also consider the following:
 - (1) the merits of the underlying application and supporting documentation in the commission's administrative record, including whether the application meets the requirements for permit issuance;
 - (2) the analysis and opinions of the ED; and
 - (3) any other expert reports, affidavits, opinions, or data submitted by the ED, the applicant, or hearing requestor.
- (e) In determining whether a person is an affected person for the purpose of granting a hearing request for an application filed before September 1, 2015, the commission may also consider the factors in subsection (d) of this section to the extent consistent with case law.

D. Referral to the State Office of Administrative Hearings

“When the commission grants a request for a contested case hearing, the commission shall issue an order specifying the number and scope of the issues to be referred to SOAH for a hearing.”⁵ The Commission may not refer an issue to the State Office of Administrative Hearings (SOAH) for a contested case hearing unless the Commission determines that the issue:

- (1) involves a disputed question of fact or a mixed question of law and fact;
- (2) was raised during the public comment period by an affected person whose hearing request is granted; and

⁵ 30 TAC § 50.115(b).

- (3) is relevant and material to the decision on the application.⁶

V. ANALYSIS OF THE REQUESTS

The ED has analyzed the hearing requests to determine whether they comply with Commission rules, if the requestors qualify as affected persons, what issues may be referred for a contested case hearing, and what is the appropriate length of the hearing.

A. Whether the Requestors Complied With 30 TAC §§ 55.201(c) and (d) and 55.203

1. *Parties the Executive Director recommends the Commission find Affected Persons*

- Henry Green and Cathy Green.
 - Henry and Cathy Green separately submitted timely comments and a hearing request which contained their names, addresses, and phone numbers pursuant to 30 TAC § 55.201(d). According to the addresses they provided, the property identified in their requests is located approximately 0.3 miles from the proposed facility's outfall.

In their requests, each of them describe their concerns about the application and draft permit regarding impacts to water quality and nuisance odors emanating from the facility. These issues fall within TCEQ's jurisdiction as set forth in Chapter 26 of the Texas Water Code and they are all relevant and material to the Commission's decision on the application.

While the Commission may have jurisdiction over these issues, the Commission may not grant the hearing requests unless the requesters substantively comply with the requirements set forth in 30 TAC §§ 55.201 & 203.

30 TAC § 55.201 requires that each requestor identify a personal justiciable in interest that affects them in ways uncommon to the general public.

Upon review of the hearing requests, the Greens identify a justiciable interest that could be affected by the draft permit in ways uncommon to the general public, specifically odor impacts to their property. Given the close proximity of their property's location to the discharge point, it is likely that a reasonable relationship exists between the enjoyment of their property and the discharge. While water quality is mentioned in their requests, there is no specific articulation as to how impacts to water quality would affect them uniquely in ways uncommon to the general public. Regarding the issue of odors, this issue is within TCEQ's jurisdiction and is both relevant and material to the decision to issue the permit. Therefore, based on the central issue raised in these requests and the articulation of how their interests would be affected, these requestors

⁶ 30 TAC § 50.115(c).

have substantively complied with the requirements of 30 TAC §§ 55.201 & 203.

Therefore, the ED recommends that the Commission grant these hearing requests.

2. Parties the Executive Director recommends the Commission not find Affected Persons

- Patrick Parker and Catherine Buchanan Lehmann.
 - Mr. Parker and Ms. Lehmann separately submitted timely comments and a hearing request which contained their names, addresses, and phone numbers pursuant to 30 TAC § 55.201(d). According to the addresses they provided, the property addresses included in their requests are located between 100 and 130.5 miles from the proposed wastewater treatment facility's outfall.

In their requests, they each describe their concerns about the application. These concerns range from general opposition to specific concerns related to the draft permit's potential impacts on water quality, wildlife, aquatic life, recreation, as well as odors emanating from the facility. While these concerns are relevant to a TPDES permit application as the Commission has jurisdiction to address these issues as part of the permitting process, these requestors have not substantially complied with the requirements of TCEQ's rules to request a hearing and be considered an affected person.

Under 30 TAC § 55.201(d), requestors must substantially comply with the requirements if this subsection for their hearing requests to be granted. Beyond a mailing address, 30 TAC § 55.201(d)(2) requires, "a brief, but specific, written statement explaining in plain language the requestor's location and distance relative to the proposed facility or activity...". While they describe local property interests in Port Alto, a city more than 3 miles from the proposed facility and outfall, they did not provide a description of where these specific properties are actually located. The addresses attached in the hearing requests are over 100 miles away. Without this information, the Commission cannot adequately assess the affectedness for these individuals.

The ED therefore recommends to the Commission that these individuals not be considered affected persons as their hearing requests have not substantially complied with the requirements of 30 TAC § 55.201(d)(2).

- Mark Hunter Echols and Martin Brown
 - Mr. Echols and Mr. Brown separately submitted timely comments and hearing requests which contained their names, addresses, and phone numbers pursuant to 30 TAC § 55.201(d). According to the addresses they provided, the property addresses included in their requests are located between 1.0 and 1.1 miles from the facility and outfall.
- In their requests, they each describe their concerns about the application. These concerns range from general opposition to specific concerns related to the draft permit's potential impacts on water quality, wildlife,

aquatic life, recreation, and the suitability of the receiving waters. While these concerns are relevant to a TPDES permit application as the Commission has jurisdiction to address these issues as part of the permitting process, these requestors have not substantially complied with the requirements of TCEQ's rules to request a hearing and be considered an affected person.

However, pursuant to 30 TAC § 55.203(c)(4) and (5), the Commission shall consider the, "likely impact of the regulated activity on the health and safety of the person, and on the use of property of the person" and, "likely impact of the regulated activity on use of the impacted natural resource by the person". According to the application, the permit would authorize the discharge of only 20,000 gallons of wastewater per day. The properties identified in these requests are at least 1 mile across the Bay. Given the amount of discharge in relation to the scale of the Bay, it is unlikely that these requestors would be affected. As the requestors have failed to establish that they would be uniquely affected in ways uncommon to the general public, they should not be considered affected persons under criteria outlined in TCEQ rules.

Therefore, the ED recommends that the Commission deny these hearing requests pursuant to 30 TAC § 55.203(c)(4) and (5).

- William Palmer, Melanie Nunley, Laurel Palmer, Wade Clare, Jennifer Clare, Philip R. Manning, and Gary L. Smith.
 - Each of these requestors separately submitted timely comments and a hearing request which contained their names, addresses, and phone numbers pursuant to 30 TAC § 55.201(d). According to the addresses they provided, the properties identified in their requests are all located at least 1.8 miles from the proposed wastewater treatment facility's outfall.

While these requestors submitted hearing requests, they contained no information other than a generalized statement of opposition and a plain request for a hearing. No information was provided that described any impact to a justiciable interest. For these reasons, their requests should be denied.

Under 30 TAC § 55.201(d)(2), requestors must identify their personal justiciable interest affected by the application. As they have only requested a hearing and have not explained to the Commission how they are uniquely affected, they have failed to substantively comply with TCEQ rules.

Therefore, the ED recommends that the Commission deny these hearing requests pursuant to 30 TAC § 55.201(d)(2).

- Billy Forester, Michelle Lee Pina, Doyle Alan Koop, Kenton Adam Moyer, Wiede Koop Cutshall, Mark Bononi, Shirley Koop Bononi, Linda Stowe Koop, Lesley A. Koop, Anetta Stewart, and Shannon Lewis.
 - Each of these requestors separately submitted timely comments and a hearing request which contained their names, addresses, and phone numbers pursuant to 30 TAC § 55.201(d). According to the addresses

they provided, the properties identified in their requests are all located more than 2.9 miles from the proposed facility's outfall.

In their requests, each of the requestors describe concerns about the application and draft permit which include the impact of freshwater discharges into the bay, potential impacts to health, wildlife, and recreation. These issues fall within TCEQ's jurisdiction as set forth in Chapter 26 of the Texas Water Code and are relevant and material to the Commission's decision on the application.

While the Commission may have jurisdiction over these issues, the Commission may not grant the hearing requests unless the requesters substantively comply with the requirements set forth in 30 TAC §§ 55.201 & 203.

30 TAC § 55.201 requires that each requestor identify a personal justiciable in interest that affects them in ways uncommon to the general public. Upon reviewing the requests, no justiciable interests were described. These individuals do not provide any information as to how the discharge would affect their interests in ways uncommon to the general public.

Therefore, the ED recommends that the Commission deny these hearing requests pursuant to 30 TAC § 55.201(d)(2).

- Concerned Citizen

- The ED received a timely hearing request from an anonymous member of the public describing themselves as a "Concerned Citizen."

In this request, the Concerned Citizen raised multiple issues and concerns about the draft permit. These issues include environmental impact studies, design plans for the facility, concerns about the potential operators, the facility's monitoring requirements, and TCEQ's regulatory role in the proposed facility's operation. While some of these issues fall within TCEQ's jurisdiction and are relevant to a decision on the permit, this hearing request fails to meet the requirements of TCEQ's rules to be granted.

Under 30 TAC § 55.201(d), hearing requests must include at a minimum a name, address, and description of how a requestor believes they will be adversely affected by the permit in a unique way. As the hearing request in question did not provide any of this information, this requestor has not substantively complied with TCEQ rules.

Therefore, the ED recommends that the Commission deny this hearing request pursuant to 30 TAC § 55.201(d).

B. Whether the Issues the Requestors Raised are Referable to the State Office of Administrative Hearings (SOAH).

1. Whether the draft permit complies with TCEQ's rules regarding nuisance odors. (RTC Response 11)

The issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, and is relevant and material to

the issuance of the draft permit. If it can be shown the draft permit does not comply with TCEQ's rules regarding nuisance odors, that information would be relevant and material to a decision on the application. The Executive Director recommends referring this issue to SOAH.

VI. REQUESTS FOR RECONSIDERATION

- Requests for Reconsideration

- Heather Broxton and David S. Hall.

TCEQ's rules provide that the request for reconsideration must expressly state that the person is requesting reconsideration of the executive director's decision and provide reasons why the decision should be reconsidered. 30 TAC § 55.201(e). The Commission received two timely requests from Heather Broxton and David S. Hall.

The issues identified in these requested concerned the permit's potential impact to health, odor emissions, wildlife, and water quality for the receiving waters. The issues raised in both of the requests concerned issues that are addressed in the ED's RTC. The ED made no changes to permit in response to these issues during the comment period.

Therefore, the Executive Director recommends that the Commission deny the Requests for Reconsideration.

VII. CONCLUSION

The Executive Director recommends the following actions by the Commission:

1. The Executive Director recommends that the Commission find Henry Green and Cathy Green affected persons and deny all other hearing requests.
2. The Executive Director recommends that the Commission deny all requests for reconsideration.
3. If referred to SOAH that the duration of the hearing be 180 days from the preliminary hearing to the presentation of a proposal for decision to the Commission.
4. If referred to SOAH, concurrently refer the matter to Alternative Dispute Resolution.
5. If referred to SOAH, refer the following issues as raised by the affected persons as identified by the Executive Director:
 - Issue A) Whether the draft permit complies with TCEQ's rules regarding nuisance odors.

Respectfully submitted,

Texas Commission on Environmental Quality

Kelly Keel,
Executive Director

Phillip Ledbetter, Director
Office of Legal Services

Charmaine Backens, Deputy Director
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REPRESENTING THE EXECUTIVE DIRECTOR
OF THE TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

CERTIFICATE OF SERVICE

I certify that on March 24, 2025, the “Executive Director’s Response to Hearing Request” for TPDES Permit WQ0015946001 for Serenity RV Resort LP was filed with the TCEQ’s Office of the Chief Clerk, and a copy was served to all persons listed on the attached mailing list via hand delivery, facsimile transmission, inter-agency mail, electronic submittal, or by deposit in the U.S. Mail.



Harrison Cole Malley
Staff Attorney
Environmental Law Division

MAILING LIST
Serenity RV Resort LP
TCEQ Docket No./TCEQ Expediente N.º 2025-0117-MWD;
TPDES Permit No./TPDES Permiso N.º WQ0015946001

FOR THE APPLICANT/PARA EL SOLICITANTE

Ethan Rafei, Director and Managing Partner
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1344 County Road
302 Port Lavaca, Texas 77979

Phi Nguyen, P.E.
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via electronic mail/vía correo electrónico:

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via electronic mail/vía correo electrónico:

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Public Interest Counsel, MC-103
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FOR ALTERNATIVE DISPUTE RESOLUTION/PARA LA RESOLUCIÓN ALTERNATIVA DE DISPUTAS

via electronic mail/vía correo electrónico:

Kyle Lucas
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Alternative Dispute Resolution, MC-222
P.O. Box 13087
Austin, Texas 78711

FOR THE CHIEF CLERK/PARA EL SECRETARIO OFICIAL

via eFilings:

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Texas Commission on Environmental
Quality Office of Chief Clerk, MC-105
P.O. Box 13087
Austin, Texas 78711

<https://www.tceq.texas.gov/goto/efilings>

REQUESTER(S)/INTERESTED PERSON(S)/SOLICITANTE(S)/ PERSONA(S) INTERESADA(S)

See attached list/Ver listado adjunto.

REQUESTER(S)/SOLICITANTE(S)

Bononi, Mark
2111 SW 98th Ter
Davie Fl 33324-4756

Bononi, Shirley Koop
2111 SW 98th Ter
Davie Fl 33324-4756

Brown, Martin
1039 Bayview Dr
Palacios Tx 77465-1491

Clare, Jennifer
5255 State Highway 35 S
Palacios Tx 77465-1887

Clare, Wade
5255 State Highway 35 S
Palacios Tx 77465-1887

Cutshall, Wiede Koop
7207 W Beverly Mae Dr
San Antonio Tx 78229-4945

Echols, Mark Hunter
1289 W Bayshore Dr
Palacios Tx 77465-1435

Forrester, Billy
4512 Sinclair Ave
Austin Tx 78756-3017

Green, Cathy
64 Shoreline Dr
Port Lavaca Tx 77979-5312

Green, Henry
64 Shoreline Dr
Port Lavaca Tx 77979-5312

Koop, Doyle Alan
1002 Spring Tide Dr
Wylie Tx 75098-7330

Koop, Lesley A
340 Marshall Johnson Ave S
Port Lavaca Tx 77979-5397

Koop, Linda Stowe
340 Marshall Johnson Ave S
Port Lavaca Tx 77979-5397

Lehmann, Catherine Buchanan
17607 Black Rose Trl
Cypress Tx 77429-3777

Lewis, Shannon
41 Flamingo St
Port Lavaca Tx 77979-5356

Manning, Philip R
2844 County Road 305
Port Lavaca Tx 77979-6066

Moyer, Kenton Adam
340 Marshall Johnson Ave S
Port Lavaca Tx 77979-5397

Nunley, Melanie
56 Buckskin Dr
Palacios Tx 77465-1938

Palmer, Laurel
5255 State Highway 35 S
Palacios Tx 77465-1887

Palmer, William
5255 State Highway 35 S
Palacios Tx 77465-1887

Parker, Patrick
Ste 1515
515 Congress Ave
Austin Tx 78701-3504

Pina, Michelle Lee
11515 Green Glade Dr
Houston Tx 77099-3313

Smith, Gary L
1374 Bego Rd
Goliad Tx 77963-3695

Stewart, Annetta
1188 Bayview Dr
Palacios Tx 77465-1492

INTERESTED PERSON(S)/ PERSONA(S)
INTERESADA(S)

Broxton, Heather
4531 Brady Blvd
Belton, Tx 76513-7054

Hall, David
5800 CR 359
Sweeny, Tx 77480

Attachment A

Serenity RV Resort LP

TPDES Permit No. WQ0015946001

Map Requested by TCEQ Office of Legal Services
for Commissioners' Agenda

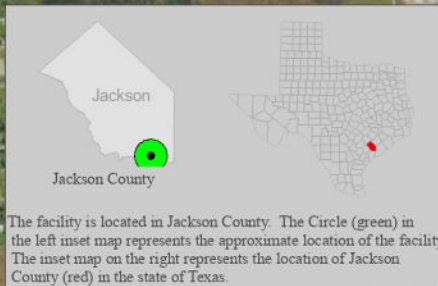
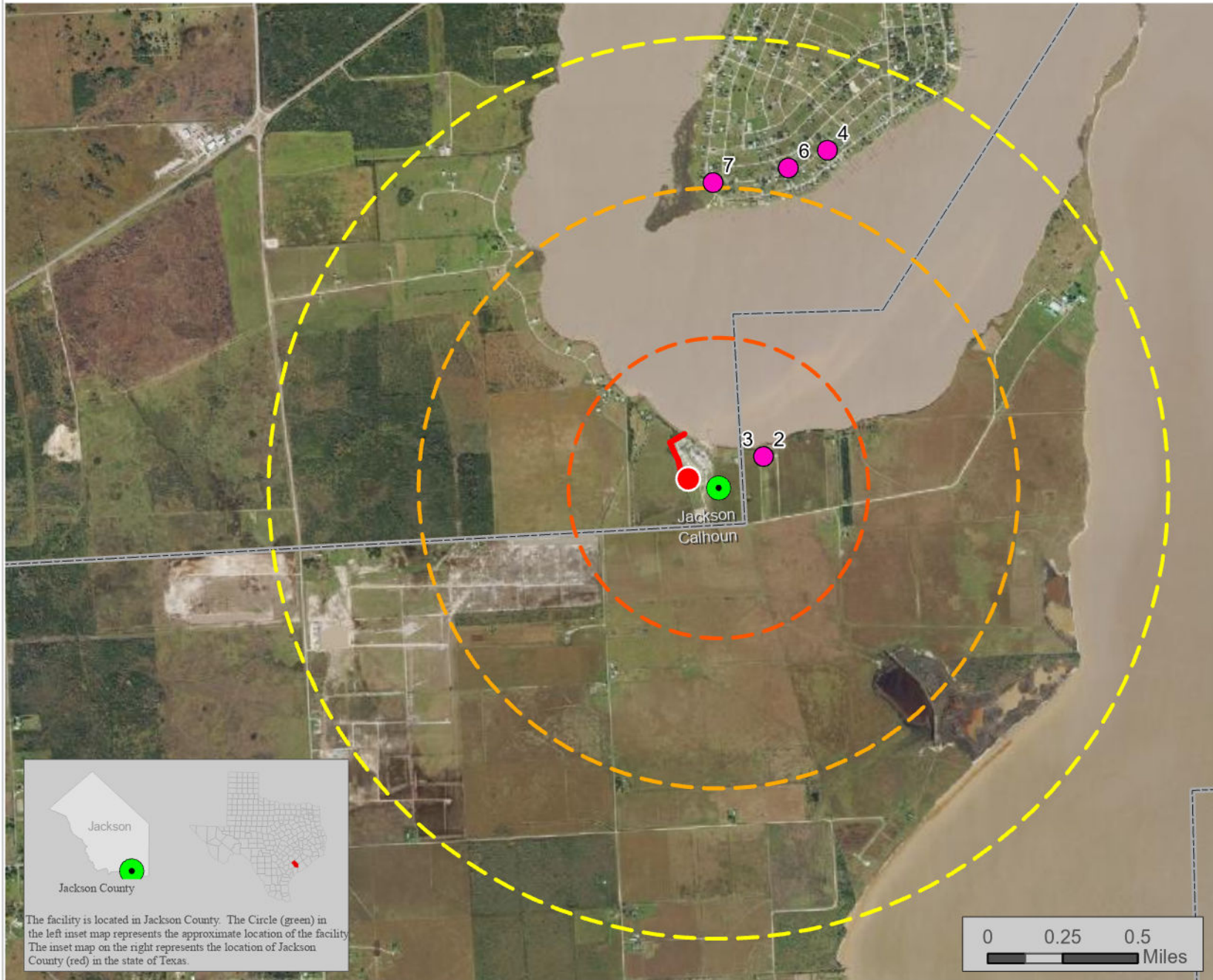


*Protecting Texas by
Reducing and
Preventing Pollution*

Texas Commission on Environmental Quality
GIS Team (Mail Code 197)
P.O. Box 13087
Austin, Texas 78711-3087
Date: 3/13/2025
CRF 0116877
Cartographer: aprovcn



- Outfall
- Requestors
- Facility Point
- Discharge Route
- 0.5 Mile Radius
- 1 Mile Radius
- 1.5 Mile Radius
- County Boundary



The facility is located in Jackson County. The Circle (green) in the left inset map represents the approximate location of the facility. The inset map on the right represents the location of Jackson County (red) in the state of Texas.



Source: The location of the facility was provided by the TCEQ Office of Legal Services (OLS). OLS obtained the site location information from the applicant and the requestor information from the requestor.

This map was generated by the Information Resources Division of the Texas Commission on Environmental Quality. This product is for informational purposes and may not have been prepared for or be suitable for legal, engineering, or surveying purposes. It does not represent an on-the-ground survey and represents only the approximate relative location of property boundaries. For more information concerning this map, contact the Information Resource Division at (512) 239-0800.

Appendix A for Serenity RV Resort LP

ID	Name	Long	Lat	State	Distance to Facility Point (miles)	Distance from Outfall (miles)
1	Billy Forester	-97.743885	30.317609	TX	136.4	136.4
2	Henry Green	-96.42721	28.706743	TX	0.2	0.3
3	Cathy Green	-96.42721	28.706743	TX	0.2	0.3
4	Annetta Stewart	-96.423161	28.721434	TX	1.2	1.2
5	Patrick Parker	-97.742673	30.267714	TX	133.6	133.5
6	Martin Brown	-96.425339	28.720639	TX	1.1	1.1
7	Mark Hunter Echols	-96.429496	28.720051	TX	1.0	1.0
8	Michelle Lee Pina	-95.58129	29.664916	TX	83.7	83.7
9	Gary L. Smith	-97.241077	28.731979	TX	49.3	49.1
10	Catherine Buchanan Lehmann	-95.690991	30.002394	TX	99.8	100.0

11	William Palmer	-96.412868	28.734253	TX	2.2	2.3
12	Laurel Palmer	-96.412868	28.734253	TX	2.2	2.3
13	Wade Clare	-96.412868	28.734253	TX	2.2	2.3
14	Jennifer Clare	-96.412868	28.734253	TX	2.2	2.3
15	Doyle Alan Koop	-96.592402	33.024244	TX	297.7	298.2
16	Mark Bononi	-80.279077	26.092849	FL	1007.9	1008.0
17	Kenton Adam Moyer	-96.420245	28.647941	TX	4.0	4.0
18	Wiede Koop Cutshall	-98.583504	29.502695	TX	141.4	141.1
19	Shirley Koop Bononi	-80.279077	26.092849	FL	1007.9	1008.0
20	Melanie Nunley	-96.42489	28.730973	TX	1.8	1.8
21	Lesley A. Koop	-96.420245	28.647941	TX	4.0	4.0
22	Shannon Lewis	-96.410479	28.668331	TX	2.8	2.9
23	Philip R Manning	-96.436033	28.662582	TX	3.0	3.0
24	Linda Stowe Koop	-96.420245	28.647941	TX	4.0	4.0